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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

MYRA R. ANZALDO,

Plaintiff,

v.

KILOLO KIJAKAZI, ACTING  
 COMMISSIONER OF SOCIAL SECURITY,

Defendant.

CASE NO.

2:23-CV-00196-BNW

**UNOPPOSED MOTION**

**FOR EXTENSION OF TIME TO FILE**

**PLAINTIFF'S BRIEF**

Plaintiff by his attorney, moves for a fifty-eight (58) day extension of time to file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed May 3, 2023.

Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance, between April 28, and June 23, 2023, staff in Counsel's office have one hundred and ninety-five (195) Plaintiff briefs due. This figure does not include Oral Arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly prepare the brief by the current deadline. This request will not cause Defendant any undue

1 hardship. This extension is needed to thoroughly and properly prepare the brief by the current  
2 deadline.

3 Wherefore, Plaintiff requests an extension from May 3, 2023 up to and including June 30,  
4 2023 to file their brief. Counsel for the Plaintiff has conferred with Defendant's Counsel who has  
5 no objection to this request.  
6

7 Dated: April 30, 2023.

8 Respectfully submitted,

9 /s/Hal Taylor

10  
11 **Plaintiff's Certificate of Service:**

12 I certify that I caused the Consent Motion for Extension of Time to be served today,  
13 April 30, 2023, by CMECF to Blaine T Welsh, and L. Jamala Edwards, who are filing users of  
14 the CM/ECF system.  
15

16 /s/Hal Taylor

17 Hal Taylor  
18  
19  
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21 **ORDER**

22 **IT IS SO ORDERED**

23 **DATED:** 12:01 pm, May 01, 2023

24 

25 **BRENDA WEKSLER**  
26 **UNITED STATES MAGISTRATE JUDGE**  
27  
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